

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

v.

Case No. 0:20-cv-01929-SRN-HB

Jamie Kreil,

Defendant.

Brock Fredin,

Plaintiff,

v.

Case No. 0:17-cv-03058-SRN-HB

Lindsey Middlecamp,

Defendant.

Brock Fredin,

Plaintiff,

v.

Case No. 0:18-cv-00466-SRN-HB

Grace Elizabeth Miller and Catherine  
Marie Schaefer,

Defendants.

**SUPPLEMENTAL MEMORANDUM IN SUPPORT OF JOINT RENEWED  
MOTION FOR AN ORDER TO SHOW CAUSE**

The parties to the above-captioned cases submit this supplemental memorandum to draw the Court's attention to new developments since the parties filed their Joint Renewed Motion for an Order to Show Cause. After the parties filed their motion, Brock Fredin retaliated by redoubling his efforts at harassment and intimidation, creating and posting numerous additional videos targeting counsel and the Court. Like the videos that prompted the Court to sanction Fredin in the first instance, the new videos feature sexually explicit material intended to embarrass, allegations of racism, and accusations of criminal conduct. *See* 2nd Lockner Decl. Exs. A-H. Fredin has also begun posting these videos to a new YouTube channel, "Judicial Dissent," as well as to a Canadian website called Rumble. *See id.* ¶¶ 17-19. Counsel have also learned that Fredin has created an additional website, ProtestPress.com, which he has used as a platform to further attack counsel. *See id.* ¶¶ 20-21, Ex. I.

Fredin created these new videos to retaliate against the parties for seeking to enforce the Court's Orders. This is clear not only from the timing of the videos, but also their descriptions. For example, in one particularly repugnant video featuring sexually explicit content and accusations of racism against Kreil's counsel, Fredin includes the following written description: "Download and share this video anywhere you can before Lockner violates the First Amendment and tries to ban it." *Id.* Ex. F; *see also id.* Ex. E ("Please share this video when Lockner

bans it.”); *id.* Ex. D (“Download and share this video before Lockner tries to ban it.”). Fredin thus openly acknowledges that he is violating the Court’s Orders, and is attempting to circumvent those Orders by inviting others not before the Court to re-post his harassing content.

Fredin’s obsessive behavior toward counsel and the Court, together with his open disregard of a Court Order requiring that he cease his harassment and criminal history of stalking, continue to put counsel in reasonable fear of their safety and privacy, as well as the safety and privacy of their families. *See* Lockner Decl. ¶ 23. His recent conduct rises to the level of “repeated incidents of intrusive or unwanted . . . words . . . that have a substantial adverse effect or are intended to have a substantial adverse effect on the safety, security, or privacy of another” within the meaning of Minnesota Statutes § 609.748. Fredin has thus violated the Court’s Order imposing sanctions in this respect as well.

The parties request that the Court take account of these new videos in ruling on their Joint Renewed Motion to Show Cause. Moreover, the parties respectfully ask that, should Fredin request an extension of time to respond to the motion, the Court take account of the fact that Fredin has dedicated the time allotted for his response to creating and posting new harassing content.

DATED: January 3, 2022

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